



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 24, 2017

Ms. Lisa Adamson
Regulatory Manager
Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, Texas 77507-1041

Subject: Label Amendment – Update WSP Mixing and Loading Language
Product Name: IMI 75 Insecticide in Water Soluble Packets
EPA Registration Number: 53883-201
Application Date: April 18, 2017
Decision Number: 528885

Dear Ms. Adamson:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

Page 2 of 2
EPA Reg. No. 53883-201
Decision No. 528885

with FIFRA section 6. If you have any questions, please contact Melody Banks by phone at (703) 305-5413, or via email at Banks.Melody@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Elyssa Arnold". The signature is written in a cursive style.

Elyssa Arnold, Acting Product Manager 01
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

10 28 2013 Last approved - Delete Turf and Ornamental Language add Pollinator Text
 11 21 2013 Notification – correct Environmental Hazards Statement & Oregon Restriction
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IMI 75
Insecticide in Water Soluble Packets
 [ABN: IMI 75 WSP}
 [ABN: IMI 75}
Generic Descriptor [Insecticide]
Generic Descriptor [Insecticide in Water Soluble Packets]

For use by individuals/firms licensed or registered by the state to apply termiticide products. For prevention or control of subterranean termites, drywood termites, dampwood termites, carpenter ants, and other wood-infesting insects. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

Foliar and Systemic Insect Control For Use on Turfgrass, Landscape Ornamentals, Non-Bearing Fruit and Nut Trees, and Interior Plantscapes.

ACTIVE INGREDIENT: Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine.....	75%
OTHER INGREDIENTS:	25%
Total:	100%

Do Not Remove Packets From Container Except For Immediate Use.
 Keep water soluble packets in this container and store in a cool dry place but not below freezing (32° F).

Keep Out of Reach of Children
CAUTION

PRECAUCION AL USUARIO: Si usted no puede leer o entender inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.
(TO THE USER: If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

FIRST AID	
If swallowed:	<ul style="list-style-type: none"> ▪ Call a poison control center or doctor immediately for treatment advice. ▪ Have person sip a glass of water if able to swallow. ▪ Do not induce vomiting unless told to do so by a poison control center or doctor. ▪ Do not give anything by mouth to an unconscious person.
If on skin or clothing:	<ul style="list-style-type: none"> ▪ Take off contaminated clothing. ▪ Rinse skin immediately with plenty of soap and water for 15 to 20 minutes. ▪ Call a poison control center or doctor for treatment advice.

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If in eyes:	<ul style="list-style-type: none"> ▪ Hold eyelid open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
<p>Have a product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this product, contact the National Pesticide Information Center, 1-800-858-7378, Monday-Friday, 7:30 AM-3:30 PM PST. You may also contact the National Poison Control Center, 1-800-222-1222, day or night, for emergency medical treatment information [or SafetyCall® at (866) 897-8050].</p>	
<p>Note To Physician: No specific antidote is available. Treat the patient symptomatically.</p>	

**PRECAUTIONARY STATEMENTS
 HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Harmful if swallowed, inhaled, or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

When treating adjacent to an existing structure, the applicator must check the area to be treated, and immediately adjacent areas of the structure, for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the clean up is completed.

Personal Protective Equipment (PPE)

Applicator and other handlers (mixers and loaders) must wear:

- Long-sleeved shirt and long pants
- Chemical resistant gloves made of: barrier laminate, butyl rubber ≥14 mils, nitrile rubber ≥14 mils, neoprene rubber ≥14 mils, natural rubber ≥14 mils, polyvinylchloride (PVC) ≥14 mils or viton ≥14 mils.
- Shoes plus socks

After the product is diluted in accordance with label directions for use, shirt, pants, socks, shoes and water-proof gloves are sufficient. In addition: all pesticide handlers must wear protective eyewear when working in a non-ventilated space or when applying termiticide by rodding or sub-slab injection.

Follow manufacturer's instructions for cleaning/ maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

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USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside, Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solutions at the specified rate. Do not treat soil that is water-saturated or frozen, or in any conditions where run-off or movement from the treated area (site) is likely to occur.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are foraging the treatment area.

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PROTECTION OF POLLINATORS



APPLICATION RESTRICTIONS EXIST FOR THIS PRODUCT BECAUSE OF RISK TO BEES AND OTHER INSECT POLLINATORS. FOLLOW APPLICATION RESTRICTIONS FOUND IN THE DIRECTIONS FOR USE TO PROTECT POLLINATORS.

Look for the bee hazard icon  in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators.

This product can kill bees and other insect pollinators.

Bees and other insect pollinators will forage on plants when they flower, shed pollen, or produce nectar.

Bees and other insect pollinators can be exposed to this pesticide from:

- Direct contact during foliar applications, or contact with residues on plant surfaces after foliar applications
- Ingestion of residues in nectar and pollen when the pesticide is applied as a seed treatment, soil, tree injection, as well as foliar applications.

When Using This Product Take Steps To:

- Minimize exposure of this product to bees and other insect pollinators when they are foraging on pollinator attractive plants around the application site.
- Minimize drift of this product on to beehives or to off-site pollinator attractive habitat. Drift of this product onto beehives or off-site to pollinator attractive habitat can result in bee kills.

Information on protecting bees and other insect pollinators may be found at the Pesticide Environmental Stewardship website at: <http://pesticidestewardship.org/PollinatorProtection/Pages/default.aspx>.

Pesticide incidents (for example, bee kills) should immediately be reported to the state/tribal lead agency. For contact information for your state, go to: www.aapco.org/officials.html. Pesticide incidents should also be reported to the National Pesticide Information Center at: www.npic.orst.edu or directly to EPA at: beekill@epa.gov.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. See individual crops for specific pollinator application restrictions. If none exist under the specific crop, for foliar applications, follow these application directions.



Do not apply this product while bees are foraging. Do not apply this product to plants that are flowering. Only apply after all flower petals have fallen off.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Instructions for Using Water Soluble Packages Directly into Spray tanks:

Water Soluble Packages (WSPs) are designed to dissolve in water. Agitation may be used, if necessary, to help dissolve the WSP. Failure to follow handling and mixing instructions can increase your exposure to the pesticide products in WSPs. WSPs, when used properly, qualify as a closed mixing/loading system under the Agricultural Worker Protection Standard [40 CFR 170.607(d)].

Handling Instructions

Follow these steps when handling pesticide products in WSPs.

1. Mix in spray tank only
2. Handle WSP(s) in a manner that protects package from breakage and/or unintended release of contents. If package is broken, put on PPE required for clean-up and then continue with mixing instructions.
3. Keep the WSP(s) in outer packaging until just before use.
4. Keep the WSP dry prior to adding to the spray tank.
5. Handle with dry gloves and according to the label instructions for PPE.
6. Keep WSP intact. Do not cut or puncture WSP.
7. Reseal the WSP outer packaging to protect any unused WSP(s).

Mixing Instructions

Follow the steps below when mixing this product, including if tank mixed with other pesticide products. If being tank mixed, the mixing directions 1 through 9 below take precedence over the mixing directions of the other tank mix products. WSPs may, in some cases, be mixed with other pesticide products so long as the directions for use of all mixed products do not conflict. Do not tank mix this product with products that prohibit tank mixing or have conflicting mixing directions.

1. If a basket or strainer is present in the tank hatch, remove prior to adding the WSP to the tank.
2. Fill tank with water to approximately one-third to one-half of the desired final volume of spray.
3. Stop adding water and stop any agitation.
4. Place intact/unopened WSP(s) into the tank.
5. Do not spray water from a hose or fill pipe to break or dissolve the WSP(s)
6. Start mechanical and recirculation agitation from the bottom of tank without using any overhead recirculation, if possible. If overhead recirculation cannot be turned off, close the hatch before starting agitation.
7. Dissolving the WSP(s) may take up to 5 minutes or longer, depending on water temperature, water hardness and intensity of agitation.
8. Stop agitation before tank lid is opened.
9. Open the lid to the tank, exercising caution to avoid contact with dusts or spray mix, to verify that the WSPs have fully dissolved and the contents have been thoroughly mixed into the solution.
10. Do not add other allowed products or complete filling the tank until the bags have fully dissolved and pesticide is thoroughly mixed.

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11. Once the WSP have fully dissolved and any other products have been added to the tank, resume filling the tank with water to the desired level, close the tank lid, and resume agitation.
12. Use the spray solution when mixing is complete.
13. Maintain agitation of the diluted pesticide mix during transport and application
14. It is unlawful to use any registered pesticide, including WSPs, in a manner inconsistent with its label.

ENGINEERING CONTROL STATEMENT

Water soluble packets, when used correctly, qualify as a closed mixing/loading system under the Worker Protection Standard [40 CFR 170.607(d)]. Mixers and loaders handling this product while it is enclosed in intact water soluble packets may elect to wear reduced PPE of long-sleeved shirt, long pants, shoes, socks, a chemical-resistant apron, and chemical-resistant gloves. When reduced, PPE specified above for “applicators and other handlers” and have such PPE immediately available for use in an emergency, such as a spill or equipment break-down.

APPLICATION AS A TERMITICIDE

IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS may be applied as an insecticidal barrier to control and prevent infestations of subterranean termites in and around structures and constructions.

For best results, applicators must be familiar with current termite control practices. These practices include trenching, rodding, sub-slab injections, coarse fan spraying of soil surfaces, crack and crevice (void) injection, and excavated soil treatment. Determining which control practices to use is dependent upon the biology and behavior of the species involved.

Proper application of this product will provide a continuous barrier between the wood and other cellulose material in the structure and the termite colonies in the soil. In some instances where an aerial or an above ground colony is established, supplemental treatments to control the termites, landscape modifications, and / or structural repairs may be needed to deprive the termites of a moisture source.

The standards for subterranean termite control may vary due to regulations, treatment procedures, soil types, construction practices and other factors. Be sure to follow all federal, state and local regulations and treatment standards for protection of structures from termites. Based on local recommendations, use a 0.05% for typical situations and a 0.10% dilution in cases of severe or persistent infestations.

Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated area, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

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MIXING TABLE FOR IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS		
GALLONS OF FINISHED SOLUTION DESIRED	NUMBER OF PACKETS NEEDED	
	0.05% CONCENTRATE	0.1% CONCENTRATE
25	1	2
50	2	4
100	4	8

MIXING: Refer to Mixing Table for proper amount of IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS to be used.

Within each foil envelope are clear inner packets containing IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS. The clear inner packet is water soluble. Do not allow packets to become wet prior to adding to the spray tank. Do not handle the clear inner packets with wet hands or wet gloves. Rough handling may cause breakage. Reseal foil envelope to protect remaining packets.

To prepare the spray mixture, open the foil envelope and drop the required number of unopened clear water soluble packets into the spray tank while filling with water to the desired level. Operate the agitator while mixing. Depending on the water temperature and the degree of agitation, the packets should be completely dissolved within a few minutes from the time they are added to the water. Cooler water temperatures increase the time needed for the inner packet to dissolve completely.

Do not use IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS with products or in a tank that may contain boron or release free chlorine. The resultant reaction of PVA and boron or free chlorine is a plastic which is not soluble in water or solvents such as diesel oils, kerosene, gasoline or alcohol. Use of chlorinated water is acceptable.

APPLICATION VOLUME

The application volumes specified in the “**DIRECTIONS FOR USE**” are to be used whenever possible. However, where soil conditions will not accept application of 4 gallons of IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS per 10 linear feet, twice the IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS concentration may be applied in 2 gallons of solution per 10 linear feet. For example, if 0.05% is the correct use rate to be applied in 4 gallons of water, then 2 gallons of 0.1% dilution may be used per 10 linear feet to deliver an equivalent amount of IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS per unit of soil.

SUBTERRANEAN TERMITE TREATMENT CONTROL

Treatment standards for subterranean termite control may vary due to regulations, treatment procedures, soil types, construction practices and other factors. The purpose of chemical soil treatment for termite control is to establish a continuous chemical treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in the structure and the termite colonies in the soil. Follow all federal, state, and local regulations and treatment standards for protection of a structure from termites. In some instances where an aerial or above ground colony is established, supplemental treatments to control the termites, landscape modifications, and/or structural repairs may be needed to deprive

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termites of a moisture source. Use a 0.05% to 0.1% dilution based on local recommendations. Generally a 0.05% dilution is used for typical control situations. Where severe or persistent infestations occur, a 0.1% dilution may be used.

PRE-CONSTRUCTION TREATMENT

Do not apply at a lower dosage and/or concentration than specified on this label for application prior to installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

CONCRETE SLAB-ON-GROUND OR BASEMENTS: Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floor and entrance platforms. Apply at the rate of 1 gallon of solution to accurately and uniformly cover 10 square feet. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons or sufficient volume of solution, to accurately and uniformly cover 10 square feet. In addition, apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes should not extend below the footing. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 psi at the treatment tool when the valve is open) to treat soil which will be placed in the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, use 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements, at the rate prescribed from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case treat a structure below the footing.

Rodding in trench followed by flooding of trench and treatment of backfill may provide a better opportunity to achieve a continuous chemical treated zone than using soil rodding alone to establish a vertical termiticide treated zone.

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CRAWL SPACES: Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet per foot of depth to provide a uniform treated zone. Rodding may be done from the bottom of a shallow trench to top of the footing or a minimum of 4 feet. When rodding, rod holes should be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area, Rod holes must not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

HOLLOW BLOCK FOUNDATIONS OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous chemical treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements).

RESTRICTION:

Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST-CONSTRUCTION TREATMENT

CONCRETE SLAB-ON-GROUND: To apply a treatment under the slab, including attached porches, carports, entrance platforms, garages and similar slab structures, it may be necessary to drill through the slab or exterior foundation. Drill holes should be spaced in a manner that will allow for application of a continuous chemical treated zone. Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet per foot of depth to provide a uniform treated zone. **DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO NOT CONTAMINATE DUCTS AND VENTS.** Plug and fill all drilled holes in commonly occupied areas with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

An application should be made by trenching or trenching and rodding around the outside of the foundation wall. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil as it is being placed in the trench.

Rodding can be done from the bottom of a shallow trench. When rodding, space rod holes in a manner that will allow for a continuous chemical treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod hole depth should not extend below the footing.

BATH TRAPS: Exposed soil or soil covered with tar or a similar type sealant beneath and around plumbing and/or drain pipe entry areas should be treated with 3 gallons of solution per square foot. An access door or inspection vent should be cut and installed, if not already present. After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil.

CRAWL SPACES: When there is insufficient clearance between floor joists and ground surfaces to allow applicator access, excavate, if possible, and treat according to crawl spaces (refer to Pre-Construction Treatment). If unable to excavate, crawl space soil and wood treatment may be used to prevent surface access by termites. Apply 1 gallon of solution (see **APPLICATION VOLUME**) per 10 square feet to provide a uniform chemical treated zone. Use a very coarse spray at a pressure not exceeding 25 psi at the treatment tool when the valve is open.

Where a crawl space cannot be reached with the application wand, use extension wands or other suitable equipment to apply a coarse spray on the soil, wood and structural members contacting the soil at the above rates. Do not apply to inaccessible crawl space areas using pressures greater than 25 psi at the treatment tool when the valve is open.

Treatment may also be made by drilling through the foundation wall or through the floor above and treating the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

To prevent subterranean termites from constructing mudtubes between soil and crawl space wood members above, an overall soil treatment of this product may be applied. Remove all cellulose debris before application. Apply 1 gallon of solution (see **APPLICATION VOLUME**) per 10 square feet to provide a uniform chemical treated zone.

OUTER FOUNDATION WALLS: Application must be made by trenching or trenching and rodding from the bottom of the trench, around the outside of the foundation walls. When trenching, excavate a trench along the outside foundation that is about 6 inches wide and 6 inches deep. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform vertical treated zone.

- For shallow foundations, one foot or less of depth, dig a narrow trench that does not exceed 6 inches wide and 6 inches deep along the inside and outside of the foundation walls, being careful not to dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing.
- For basements and other foundations deeper than one foot, the application must be made by trenching and rodding from bottom of a shallow trench. When rodding, rod hole must be spaced not to exceed 12 inches in a manner that will allow for a

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continuous chemical treated zone. Rod holes must not extend below the footing. Rodding depth should be to the top of the footer, or to a maximum depth of 4 feet when footing is more than 4 feet below grade, or according to state or local regulations.

- For all applications, apply the solution into the trench and mix with the excavated soil as it is replaced into the trench. Use a low-pressure spray to treat soil that will be replaced into the trench after rodding. Mix spray solution with the soil as it is being replaced in the trench.

BASEMENTS - INSIDE PERIMETER: If necessary, treat by drilling along the perimeter of the interior walls. Applications also may be necessary around sewer pipes, floor drains, conduits, expansion joints or any cracks or holes in the basement floor. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to provide a uniform treated zone. Drill holes must be spaced in a manner that will allow for application of a continuous chemical treated zone. Plug and fill all drill holes in commonly occupied areas of the building with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

HOLLOW BLOCK FOUNDATION OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous chemical treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements).

PLENUMS: For plenum-type structures which use a sealed underfloor space to circulate heated and/or cooled air throughout the structure, apply the dilution at the rate of 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth of soil to provide a uniform treated zone adjacent to both sides of foundation walls, supporting piers, plumbing and conduits. The soil should be treated by trenching to a depth of 6 inches or trenching and rodding (where conditions permit) or to the top of the footing. When conditions will not permit trenching or rodding, a surface application adjacent to interior foundation walls may be made, but the treated strip shall not exceed a width of 18 inches, horizontally, from the foundation walls, piers or pipes. The surface application will be made at a rate of 1.5 gallons of solution per 10 square feet as a very coarse spray under low pressure (not to exceed 25 psi when measured at the treating tool when valve is on).

When treating plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

RESTRICTION

Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

TREATMENT AROUND WELLS OR CISTERNS:

Structures With Wells/Cisterns Inside Foundations: Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

1. Do not apply within 5 feet of any well or cistern by rodding and/or trenching or by the backfill method. Treat soil between 5 and 10 feet from the well or cistern by the backfill method only. Treatment of soil adjacent to water pipes within 3 feet of grade must only be done by the backfill method.
 - a) Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
 - b) Treat the soil at the rate of 4 gallons of solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
 - c) After the treated soil has absorbed the solution, replace the soil into the trench.
2. Treat infested and/or damaged wood in place using an injection technique such as described in the “**Control of Wood Infesting Pests**” section of this label.

Structures With Adjacent Wells / Cisterns and/or Other Water Bodies:

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from the well to the structure, if the pipe(s) enter the structure within 3 feet of grade.
2. Prior to treatment applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.
3. When appropriate (i.e., on the water side of the structure), the treated backfill technique (described above) can also be used to minimize off-site movement of termiticide.

RESTRICTION:

Do not contaminate wells or cisterns.

EXTERIOR PERIMETER/INTERIOR SPOT TREATMENT*

*Not approved for use in Louisiana

USE INFORMATION

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3-23-2016 – EPA directed revisions

Exterior Perimeter/Interior Spot Treatment is an optional method of termite treatment only for use in post-construction applications, after the final grade is established. Structural protection when using the Exterior Perimeter/Interior Spot Treatment is accomplished by: 1) establishing a continuous treated zone around the entire exterior foundation wall of the building; and 2) spot-treating infested areas on the building interior. Soil adjacent to the exterior foundation wall must be treated in the same manner as conventional (full) application. It is required that a complete and continuous treated zone be achieved around the entire exterior perimeter, including under any attached slabs such as garages, porches, patios, driveways and pavement adjoining the foundation. Interior spot treatments must then be made to any indoor areas where termite activity is present. Optional interior spot treatments may also be made to high risk areas including, but not limited to, plumbing and utility penetrations (including bath traps), along settlement cracks and expansion joints, and dirt-filled porches.

Exterior Perimeter/Interior Spot Treatment can be used either as a preventative treatment (before structural infestation occurs) or as a curative treatment (after structural infestation occurs) in existing structures. Preventative treatment does not include pre-construction applications made to protect new construction. It is required that a thorough structural inspection be completed, before treatment, to locate all areas of active infestation. Spot treatment of all known sites of termite activity is required with this optional labeling. If no termite activity is observed inside the structure, interior spot treatments are not required.

EXTERIOR PERIMETER TREATMENT

It is required that all structures, regardless of the type of construction, be protected by establishing a vertical treated zone along the outer perimeter of the foundation wall. Consult the **OUTER FOUNDATION WALLS** section of this label (see below) for detailed directions on this treatment procedure.

1. OUTER FOUNDATION WALLS: Application must be made by trenching, or where appropriate (see below) by trenching, or trenching and rodding from the bottom of the trench, around the outside of the foundation walls. When trenching, excavate a trench along the outside foundation that is about 6 inches wide and 6 inches deep. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth to provide a uniform vertical treated zone.

- For shallow foundations, one foot or less of depth, dig a narrow trench that does not exceed 6 inches wide and 6 inches deep along the inside and outside of the foundation walls, being careful not to dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing.
- For basements and other foundations deeper than one foot, the application must be made by trenching and rodding from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not exceed 12 inches, to be deposited along the treated area. Rod holes must not extend below the footing. Rodding depth must be to the top of the footer, or to a maximum depth of 4 feet, or according to state or local regulations.

For all applications, apply the solution into the trench and mix with the excavated soil as it is replaced into the trench. Use a low-pressure spray to treat soil that will be replaced into the trench after rodding. Mix spray solution with the soil as it is being replaced in the trench.

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Where direct access to soil on the outer foundation wall is impossible due to attached porches, entrance platforms, garages and similar slab structures, consult the **CONCRETE SLAB-ON-GROUND** section of this label for directions on treatment of soil beneath these structures. However, where obstructions (e.g., concrete walkways) adjacent but not attached to foundation, or where soil type and/or conditions, prevent trenching the exterior perimeter treatment may be performed at the obstructed location by rodding alone. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not exceed 12 inches, to be deposited along the treated area.

2. CONCRETE SLAB-ON-GROUND: To treat soil beneath a slab, including attached porches, carports, entrance platforms, garages and similar slab structures abutting the foundation wall, it is necessary to drill through the slab. If an infestation is associated with an expansion joint, crack, utility penetration, or similar access point in the slab, treat by drilling and injecting through the slab. Drill holes must be spaced in a manner that will allow for application of a continuous chemical treated zone, but must extend a minimum of 3 feet on both sides of the infested site. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet. **DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO NOT CONTAMINATE DUCTS AND VENTS.** Plug and fill all drilled holes in commonly occupied areas with suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

3. INACCESSIBLE CRAWL SPACES: If termite activity is found along the perimeter wall or on a pier within an inaccessible crawl space, areas with termite activity must be treated. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet to create a vertical treated zone, which must extend a minimum of 3 feet on both sides of the infested site.

Optional directions for horizontal rodding: Treatment may also be made by drilling through the foundation wall (or through the floor above) to treat the soil along the perimeter wall at a rate of 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have shorter intervals so check state regulations which may apply. If termite activity is neither along the perimeter wall nor on a pier within the inaccessible crawl space, to prevent subterranean termites from constructing mud tubes between soil in the crawl space and wooden elements in the structure, an overall soil treatment of this product may be applied. Remove all cellulose debris before application. Apply 1 gallon of solution (see **APPLICATION VOLUME**) per 10 square feet to provide a uniform chemical treated zone.

4. ACCESSIBLE CRAWL SPACES: If termite activity is found within an accessible crawl space, the area(s) where termite activity exist must be treated by trenching, or trenching and rodding from the bottom of the trench, along the interior foundation walls, around piers, interior supports in contact with the soil, plumbing, or utility services. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet, per foot of depth, to create a vertical treated zone, which must extend a minimum of 3 feet on both sides of the infested site. Rodding may be done from the bottom of a shallow trench to the top of the footing or to a minimum of depth of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the

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treated area. Rod holes must not extend below the footing. When trenching, dig a narrow trench about 6 inches wide and 6 inches deep. Use a low-pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

RESTRICTION:

Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

INTERIOR SPOT TREATMENT

Targeted applications must be made to all known infested sites inside the structure. One or more of the following application methods must be used to make interior spot treatments:

- Sub-slab injections made through the slab at or near areas where termites are known to be penetrating the slab to reach wood in the structure and/or at or near sites of active infestations. Apply 4-gallons per 10 linear feet per foot of depth. Sub-slab injections must extend to a minimum of 3 feet on either side of every known infested site at expansion joints or cracks in slabs.
- Void treatments using injection of sprays, mists or foams into above ground structural voids, termite carton nests, and other infested locations.
- Wood treatments using injection techniques and/or surface applications, to treat active infestations in structural timbers.

To maximize dispersion of treatment solution in soil and in above ground locations, the use of foam and directional dispersion tips is encouraged for all interior spot treatments. Consult section(s) of this label appropriate to the element of construction, **FOAM APPLICATIONS** or **CONTROL OF WOOD INFESTING PESTS** for detailed directions on any of these treatment procedures.

1. INTERIOR SLABS: When termite activity is located within an interior wall or structural member, the soil beneath the slab and the wall void at this site of activity must be treated. The source of infestation at an expansion joint, crack, through a utility penetration, or similar access point in the slab, must be treated by drilling and injecting through the slab. Drill holes in the slab must be spaced in a manner that will allow for application of a continuous chemical treated zone, which must extend a minimum of 3 feet on either side of the infested site. Apply 4 gallons of solution (see **APPLICATION VOLUME**) per 10 linear feet. To maximize dispersion of treatment solution in soil, the use of foam and directional dispersion tips is encouraged. To treat the wall void, consult section(s) of this label appropriate to the element of construction, **FOAM APPLICATIONS** or **CONTROL OF WOOD INFESTING PESTS** for detailed directions on any of these treatment procedures.

DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO NOT CONTAMINATE DUCTS AND VENTS. Plug and fill all drilled holes in commonly occupied areas with suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

2. HOLLOW BLOCK FOUNDATION OR MASONRY VOIDS: Termite activity located within hollow-block foundations or masonry voids must be treated. Spot treatment at the site(s) of

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termite activity must extend a minimum of 3 feet on both sides. Treat masonry voids by applying 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Drill spacing in masonry voids must be at intervals not to exceed 16 inches; states may have shorter intervals so check state regulations which may apply. To maximize dispersion of treatment solution in voids, the use of foam and directional dispersion tips is encouraged. To treat structural voids above sites of termite activity in masonry, consult section(s) of this label appropriate to the element of construction, **FOAM APPLICATIONS** or **CONTROL OF WOOD INFESTING PESTS** for detailed directions on any of these treatment procedures. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to **Precautionary Statements**).

RESTRICTION:

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3. **BATH TRAPS:** If termite activity is observed within 2 feet of the bath trap, then exposed soil or soil covered with tar or a similar type of sealant around plumbing and/or drain pipe entry areas must be treated. Tar or sealant may have to be removed to allow for adequate soil treatment. An access door or inspection portal should be installed if one is not present. After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil at a volume of no less than 3 gallons of solution per square foot.

4. **SHOWER OR FLOOR DRAINS:** If termite activity is observed within 2 feet of a shower or floor drain in the slab, then soil beneath the drain must be treated. Drill through the slab adjacent to the drain and use sub-slab injection to apply solution to the soil. Multiple access points may be drilled adjacent to the drain. Treat soil at a volume of 1 gallon of solution per square foot.

FOAM APPLICATIONS

Construction practices, soil subsidence and other factors may create situations in which a continuous chemical treated zone cannot be achieved using conventional treatment alone. In situations where necessary, conventional application methods can be supplemented through use of foam generating equipment, or similar devices, to provide a continuous treated zone.

Foam application may be made alone or in combination with conventional application methods, provided that the labeled amount of active ingredient per unit area is used.

Foam Application Use Directions: Mix solution of IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS with manufacturer's specified volume of foaming agent (see table for foaming instructions). Apply a sufficient volume of IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS foam alone or in combination with liquid solution to provide a continuous treated zone at the specified rate for specific application sites. Use appropriate dispersion tips and application method for site.

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MIXING TABLE FOR IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS FOAM				
IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS ^a	GALLONS OF WATER	FOAM EXPANSION RATIO	FINISHED FOAM	
			(gallons)	(ai%)
ONE	1	25:1	25	0.05
	2.5	10:1		
	5	5:1		
TWO	1	50:1	50	
	2.5	20:1		
	5	10:1		
TWO	1	25:1	25	0.10
	2.5	10:1		
	5	5:1		
FOUR	1	50:1	50	
	2.5	20:1		
	5	10:1		
^a Add the manufacturer's specified quantity of foam agent to the IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS solution.				

Depending on the circumstances, foam applications may be used alone or in combination with liquid solution applications. Applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids or structural voids, wall voids, under slabs, stoops, porches, or to the soil in crawlspaces, and other similar voids.

Foam and liquid applications must be consistent with volume and active ingredient instructions in order to ensure proper application has been made. The volume and amount of active ingredient are essential to an effective treatment. At least 75% of the gallons of IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS must be applied as a typical liquid treatment. The remaining 25% or less gallons are delivered to appropriate locations using a foam application.

When foam is used solely to kill subterranean termites in above ground locations (such as feeding galleries in wooden framing, or in voids with framed walls), and whenever the target pest is other than subterranean termites (drywood termites, beetles, ants, etc.) dilute solutions of IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS may be expanded by foaming without concentrating the solution as previously described for soil applications. Add the manufacturers' specified volume of foaming agent to produce foam of the desired expansion ratio. Use application tips and methods suitable to the site and pest.

CONTROL OF WOOD INFESTING PESTS

For control of **above ground termites and carpenter ants** in localized areas, apply a 0.05 to 0.1% solution or sufficient volume of IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS foam to voids and galleries in damaged wood, and in spaces between wooden

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structural members and between the sill plate and foundation where wood is vulnerable. Applications may be made to inaccessible areas by drilling, and then injecting the suspension or foam with a suitable directional injector into the damaged wood or wall voids. Termite carton nests in building voids may be injected with a 0.05 to 0.1% suspension or foam. Multiple injection points to varying depths may be necessary. It is desirable to physically remove carton nest material from building voids when such nests are found. Application to attics, crawl spaces, unfinished basements, or man-made voids may be made with a coarse fan spray of 0.05 to 0.1% solution or foam to control exposed worker and winged reproductive forms of termites or carpenter ants. This type of application is intended to be a supplemental treatment for control of above ground subterranean termites and carpenter ants.

It is recommended to remove or prune away any shrubbery, bushes, and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure. This may allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS can be made to these nests.

Use a 0.05% to 0.1% solution to control existing infestations of or to prevent infestation by termites or carpenter ants in trees, utility poles, fencing and decking materials, landscape timbers and similar non- structural wood-to-soil contacts. If possible, locate the interior infested cavity and inject a 0.05 to 0.1% solution or sufficient volume of IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS foam using an appropriate treatment tool with a splashback guard. These non-structural wood-to-soil contacts may also be treated by applying a solution to the soil as a spot application or continuous treated zone applied as a drench or by rodding around the base of the point(s) of soil contact(s). Space rod holes approximately 3 inches away from the soil contact point(s) and spaced no more than 12 inches along the perimeter of the soil contact(s). For small poles or posts (<6 inches in diameter), apply 1 gallon per foot of depth. For larger constructions, apply 4 gallons per 10 linear feet per foot of depth. Retreat as needed to maintain protection.

Termite carton nests in trees may be injected with a 0.05 to 0.1% solution or sufficient volume of foam using a pointed injection tool. Multiple injection points to varying depths may be necessary. Removal of carton material from trees is desirable but may not be necessary when foam application is used. In some instances, a perimeter application of a 0.05 to 0.1% solution applied to soil around the root flare of the tree may be necessary to prevent reinfestation by termites in the soil. For small trees (<6 inches in diameter), apply 1 gallon of solution. For larger trees, apply 4 gallons per 10 linear feet (measured as the circumference at the root flare).

Drywood termites and wood-infesting beetles or borers (such as powder post beetles, anobiid or deathwatch beetles, false powder post beetles, old house borers, wharf borers, or ambrosia or bark beetles). **Galleries and structure voids** can be treated with sprays, mists, or foams of a 0.05 to 0.1% IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS solution. Locate galleries by using visual signs (frass or pellets, blistered wood, emergence or clean out holes), the presence of live insects, mechanical sounding techniques, or listening devices (e.g., stethoscopes, acoustic emission detectors). Penetrate the gallery system by drilling holes to receive the injector tip or treatment tool. Distribute drill holes to adequately

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cover the gallery system. [Do not drill where electrical wiring, plumbing lines, etc. are located.] Apply IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS solutions as a low pressure (about 20 psi) spray or by misting or, where appropriate, by foaming. It is not necessary to treat to the point where runoff is detected from adjacent holes. [Do not apply where electrical shock hazards exist.] Seal drill holes after treatment. Also, **wood surfaces** can be sprayed or misted with a 0.05 to 0.1% solution or, where appropriate, use a sufficient volume of foam. For inaccessible surfaces, drill and treat the interior of structural voids. Surfaces treated may include exposed wooden surfaces in crawlspaces, basements, or attics, wooden exterior surfaces such as decks, fencing, or siding, structural voids, channels in damaged wood, in spaces between wooden members of a structure, and junctions between wood and foundations. Apply by brushing or as a coarse, low pressure (about 20 psi) spray to the wood surface; apply sufficient volume to cover the surface to the point of wetness, but do not apply to the point of runoff. When spraying overhead in living areas, cover surfaces below the treated area with plastic sheeting or similar material. Do not contact treated surfaces until spray deposits have dried. Retreat as needed to maintain protection.

Localized treatment for carpenter bees: Apply a 0.05 to 0.1% solution as a spray or mist, or sufficient volume of foam, directly into gallery entrance holes. Following treatment, entrance holes may be plugged with small pieces of steel wool or similar material.

RETREATMENT

Retreatment for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the treated zone due to construction, excavation, or landscaping and/or evidence of the breakdown of the termiticide treated zone in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the treated zone. Retreatment may be made as either a spot or complete treatment.

When a structure is not known to be reinfested and the treated zone is not disturbed, but where the structure was last treated five or more years ago, retreatment may be performed if, in the judgment of the applicator, it is necessary to ensure adequate protection of the structure. In determining the timing of any retreatment the applicator should consider efficacy and/or degradation data and/or site-specific conditions and previous experience that indicate a vulnerability of the structure to termite attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

When another registered termite control product/system is used as the primary treatment for prevention or control of subterranean termites and is applied to all label-specified areas, IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS may be applied as a spot application in a secondary treatment to critical areas of the structure including plumbing and utility entry sites, bath traps, expansion joints, foundation cracks, the outside foundation wall, and areas of known or suspected activity at either a pre-construction or post-construction timing. These secondary treatments must be applied in amounts and concentration in accordance with label directions relevant to the treatment area(s) to receive the secondary treatment.

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For control of ants (except harvester, fire and pharaoh ants) in houses and other structures, apply a 0.05 to 0.1% solution as a general surface, spot, crack and crevice or wall void application. Apply to surfaces on buildings, porches, patios and other structures, around doors and windows, eaves and attic vents, utility entry points, soffit areas, and other exterior openings (including foundation cracks or drilled holes) where these pests enter the structure, or where they crawl or hide. Spray into cracks and crevices. Spray, mist or foam into voids where these ants or their nests are present. Apply the volume of spray mist or foam sufficient to cover the area, but do not allow excessive dripping or run-off to occur from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food or harborage. Do not apply this product to groundcover (flowers, shrubs or plant beds) that are in flower. Apply only after all petals have fallen off. To control ants tunneling in soil, apply a 0.05 to 0.1% solution as a drench or soil injection at intervals to establish a continuous treated zone. Treat along the edge of walls, driveways or other hard surfaces where ants are tunneling beneath the surface.

Aerial Nests: If ant nests are located in tree hollows or non-structural wooden construction (e.g.; posts, fences, decks) treat the interior cavity and/or the nest site by injecting a 0.05% to 0.1% solution as a spray mist, or sufficient volume of foam

Apply in sufficient water to cover the foliage and soil area being treated. Maximum application is once per month to maintain control.

Do not allow residents or pets into the immediate area during the application or contact with treated areas until spray has dried. Interior applications for ant control are limited to spot, crack and crevice, or wall void applications only.

Where severe pest pressures may exist and when rapid knockdown or exclusion at pest entry points is desired, supplemental treatments using IMI 75 INSECTICIDE IN WATER SOLUBLE PACKETS with targeted applications of a pyrethroid product labeled for this use to doors and windows, utility entry points, and other places where these pests enter the structure. Read and follow all label directions for use of this companion product.

RESTRICTIONS

- **Do not use this product against native or imported fire ants, pharaoh or harvester ants.**
- Do not apply solution until location of heat pipes, ducts, water and sewer lines and electrical conduits are known and identified. Caution must be taken to not puncture or inject into these structural elements.
- Do not treat within a distance of one foot out from the drip line of edible plants.
- Do not contaminate public and private water supplies.
- Do not formulate this product into other end-use products.
- Do not apply at a lower dosage and/or concentration than specified on this label.
- Do not apply this product, by any application method to linden, basswood, or other *Tilia* species.
- When treating soil, turf or ground cover, do not allow this product to contact

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blooming plants..

PRECAUTIONS FOR APPLICATIONS

After treatment, plug and fill all holes drilled in concrete slab areas of the building with a suitable sealant. Use anti-backflow equipment or an air gap on filling hoses.

Consult State, Federal, or local authorities for information regarding the approved treatment practices for areas in close proximity to potable water supplies.

APPLICATION TO TURFGRASS, LANDSCAPE ORNAMENTALS, RESIDENTIAL FRUIT & NUT TREES, AND INTERIOR PLANTSCAPES

MIXING: Inside each foil pouch is a clear inner water soluble packet containing this product. Do not allow packets to become wet prior to adding to the spray tank. Do not handle the clear inner packets with wet hands or wet gloves. Rough handling may cause breakage. Reseal outer carton to protect remaining packets.

To prepare the spray mixture, remove the outer foil pouch and drop the required number of unopened clear water soluble packets, as determined under **Application Instructions**, into the spray tank while filling with water to the desired level. Operate the agitator while mixing. Depending on water temperature and amount of agitation, the packets should completely dissolve within a few minutes after they are added to the water. Allow longer time for the clear packet to dissolve when using cooler water.

Do not use product packets in a tank-mix with products that contain Boron or release free chlorine. The resultant reaction of PVA and boron or free chlorine is a plastic which is not soluble in water or solvents such as diesel oils, kerosene, gasoline or alcohol. Do not attempt to use the packets directly in diesel oils or summer spray type oils as in ULV or LV uses. PVA packets are water soluble not oil soluble. Use of chlorinated water is acceptable.

This product has been found to be compatible with commonly used fungicides, miticides, liquid fertilizers, and other commonly used insecticides. Check physical compatibility using the correct proportion of products in a small jar test if local experience is unavailable.

Do not apply through any irrigation system.

USE RESTRICTIONS

- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not allow runoff or puddling of irrigation water following application.
- Keep children and pets off treated area until dry.
- Do not apply this product to areas which are water logged or saturated, or frozen,

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which will not allow penetration-into the root zone of the plant.

- Do not apply more than 8.6 oz. (0.4 lb. of active ingredient) per acre per year.
- Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon.
- Not for use on plants being grown for sale or other commercial use, for commercial seed production, or for research purposes. Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.
- Not for use in commercial greenhouses, nurseries or on grasses grown for seed, or on commercial fruit and nut trees.



Follow application restrictions on page (XX) to protect bees and other insect pollinators.

TURFGRASS

This product can be used as directed on turfgrass in the following sites: home lawns, business and office complexes, shopping centers, residential complexes, golf courses, airports, cemeteries, parks, playgrounds, athletic fields to control soil inhabiting pests as listed in the table below.

Effective control is achieved when applications are made before or during the egg laying period. The timing of applications can be based on historical monitoring of the site, previous records or experiences, current season adult trapping or other methods. For best control apply prior to egg hatch of the target pests, followed by sufficient irrigation or rainfall to move the active ingredient through the thatch.

Irrigation or rainfall must occur within 24 hours after application to move the active ingredient through the thatch. Do not make applications when turfgrass areas are waterlogged or the soil is saturated with water. Adequate distribution of the active ingredient cannot be achieved when these conditions exist. The area to be treated must be able to accept vertical penetration of rainfall or irrigation water. Do not mow turf or lawn area until after sufficient irrigation or rainfall has occurred so that uniformity of application will not be affected. Keep children and pets off treated areas following application until the spray has dried.

Do not apply more than 8.6 oz. (0.4 lb of active ingredient) per acre per year (2.93 gallons per 1000 sq. ft./year).

APPLICATION INSTRUCTIONS

Apply this product in sufficient water to provide adequate distribution in the treated area. The use of accurately calibrated equipment normally used for the application of turfgrass insecticides is required. Use equipment which will produce a uniform, coarse droplet spray, using a low pressure setting to eliminate off target drift. Check calibration periodically to ensure that equipment is working properly.

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Consult your local State Agricultural Experiment Station or State Extension Turf Specialists for more specific information regarding timing of application.

TURFGRASS		APPLICATION INSTRUCTIONS
PEST	RATE	
Larvae of: European Crane Fly, (<i>Tipula paludosa</i>) Annual bluegrass weevil, (<i>Hyperodes</i> spp.) Green June Beetle, (<i>Cotinis nitida</i>) May or June beetle, (<i>Phyllophaga</i> spp.) Asiatic garden beetle, (<i>Maladera castanea</i>) Japanese Beetle, (<i>Popillia japonica</i>) Billbug, (<i>Spherophorus</i> spp.) Northern masked chafer and Southern masked chafer, (<i>Cyclocephaloborealis</i> , <i>C. immaculata</i> , and/or <i>C. lurida</i>) Black turfgrass ataenius, (<i>Ataenius spretulus</i> and <i>Aphodius</i> spp.) Oriental Beetle, (<i>Anomala orientalis</i>) Cutworms (suppression), (<i>Phyllophaga</i> spp.), European chafer, (<i>Rhizotroqus majalis</i>)	1.6 oz. (1 packet) per 8,250 to 11,000 sq. ft.	For best results, for the control of grubs, billbugs, European crane fly and annual bluegrass weevil, make application prior to egg hatch of the target pest. Refer to “Application Instructions” section of the label.
Chinchbug (suppression) Mole Crickets, (<i>Scapteriscus</i> spp.)	1.6 oz. (1 packet) per 8,250 sq. ft.	For suppression of chinchbugs, make application prior to hatching of the instar nymphs. For control of mole crickets make application prior to or during the peak egg hatch period. When adults or large nymphs are present and actively tunneling, application should be accompanied by a curative insecticide. Follow label instructions for other insecticides when tank-mixing.

ORNAMENTALS

This product is for use on ornamentals in commercial and residential landscapes and interior plantscapes. Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon.

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FOLIAR APPLICATIONS

This product mixes with water and may be used in a variety of application equipment. Mix product with the required amount of water and apply as directed for the selected use pattern.

When making foliar applications on hard to wet foliage such as holly, pine, or ivy, add a spreader/sticker if needed. If concentrate or mist type spray equipment is used, use an equivalent amount of product on the area sprayed, as would be used in a dilute application.

APPLICATION INSTRUCTIONS

This product is a systemic product and will be translocated upward into the plant system from root uptake. To best results, place the product where the growing portion of the target plant can absorb the active ingredient. The addition of a nitrogen containing fertilizer, where applicable, into the solution may enhance the uptake of the active ingredient. Application can be made by foliar application or soil applications; including soil injection, drenches, and broadcast sprays. Foliar applications offer locally systemic activity against insect pests.

When making soil applications to plants with woody stems, systemic activity will be delayed until the active ingredient is translocated throughout the plant. In some cases, this translocation delay could take 60 days or longer. For this reason, applications should be made prior to anticipated pest infestation to achieve optimum levels of control.

For outdoor applications, do not apply more than 8.6 oz (0.4 lb of active ingredient) per acre per year.

Ant Management Programs

Use this product to control aphids, scale insects, mealybugs and other sucking pests on ornamentals to limit the honeydew available as a food source for ant populations. Supplement applications with residual sprays, bait placements or other ant control tactics to further reduce the pest population.

FOR ORNAMENTAL TREES, SHRUBS, EVERGREENS, FLOWERS, FOLIAGE PLANTS, GROUND COVERS, AND INTERIOR PLANTSCAPES

For use along the outside perimeters of industrial and commercial buildings and residential areas.

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PEST	RATE	APPLICATION INSTRUCTIONS
Adelgids Aphids Japanese beetles Lace bugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassywinged sharpshooter) Mealybugs Psyllids Sawfly larvae Thrips (suppression) Whiteflies	1.6 oz. (1 packet) per 300 gals. of water	Foliar Applications: Start treatments prior to establishment of high pest populations and reapply on an as needed basis not to exceed the maximum use rate of 8.6 oz (0.4 lb of active ingredient) per acre per year.
White grub larvae (such as Japanese beetle larvae, Chafers, <i>Phyllophaga</i> spp. Asiatic garden beetle, Oriental beetle)	1.6 oz. (1 packet) per 8,250 to 11,000 sq. ft.	Broadcast Applications: Mix required amount of product in sufficient water to uniformly and accurately cover the area being treated. Do not use less than 2 gallons of water per 1000 sq. ft. For optimum control, irrigate thoroughly to incorporate this product into the upper soil profile. Refer to FLOWERS and GROUNDCOVERS for additional use directions.

TREES, SHRUBS, FLOWERS AND GROUNDCOVERS

For use along the outside perimeters of industrial and commercial buildings and residential areas to control the insect pests listed below.

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PEST	SITE/RATE	APPLICATION INSTRUCTIONS
Adelgids Aphids Armored scales (suppression) Black vine weevil larvae Eucalyptus longhorned borer Flatheaded borers (including bronze birch borer and alder borer) Japanese beetles Lace bugs Leaf beetles (including elm and viburnum leaf beetles) Leafhoppers (including glassywinged sharpshooter) Leafminers Mealybugs Pine tip moth larvae Royal Palm Bugs Sawfly larvae Soft Scales Thrips (suppression) White grub larvae Whiteflies	TREES 1.6 oz. (1 packet) per 24 to 48 inches of cumulative trunk diameter	<p>Mix required dosage in sufficient water to inject an equal amount of solution in each hole. Maintain a low pressure and use sufficient solution for distribution of the liquid into the treatment zone. For optimum control, keep the treated area moist for 7 to 10 days. Do not use less than 4 holes per tree.</p> <p>SOIL INJECTION¹: For application to trees - Grid System: Holes should be spaced on 2.5 foot centers, in a grid pattern, extending to the drip line of the tree. Circle System: Apply in holes evenly spaced in circles, (use more than one circle dependent upon the size of the tree) beneath the drip line of the tree extending in from that line. Basal System: Space injection holes evenly around the base of the tree trunk no more than 6 to 12 inches out from the base.</p> <p>For application to shrubs - Apply to individual plants using dosage indicated.</p> <p>SOIL DRENCH: Uniformly apply the dosage in no less than 10 gallons of water per 1000 square feet as a drench around the base of the tree, directed to the root zone. Remove plastic or any other barrier that will stop solution from reaching the root zone.</p> <p>For Control of Specified Borers: Application to trees already heavily infested may not prevent the eventual loss of the trees due to existing peat damage and tree stress.</p> <p>Apply as a broadcast treatment and incorporate into the soil before planting or apply after plants are established, prior to bloom or after all petals have fallen off. If application is made to established plants, irrigate thoroughly after application.</p>
	SHRUBS 1.6 oz. (1 packet) per 24 to 48 inches of cumulative shrub height	
	FLOWERS & GROUNDCOVERS 1.6 oz. (1 packet) per 8,250 to 11,000 sq. ft.	
<p>¹ No Soil Injection Applications Allowed in Nassau or Suffolk Counties of New York. Maximum yearly application amount is 5.6 ounces (0.4 lb a.i.) per acre</p>		

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FOR USE ALONG THE OUTSIDE PERIMETERS OF INDUSTRIAL AND COMMERCIAL BUILDINGS AND RESIDENTIAL AREAS

SITE	PEST	RATE	APPLICATION INSTRUCTIONS
POME FRUIT: Apple, Crabapple, Loquat, Mayhaw, Pear, Pear (Oriental), Quince	Aphids (except woolly apply aphid) Leafhoppers (including glassywinged sharpshooter) Leafminer Mealybugs ² San Jose Scale ²	1.6 oz. (1 packet) per 300 gals. of water (2.1 oz. per acre ¹)	<p>Apply specified dosage as foliar spray as needed after petal-fall is complete.</p> <p>For control of rosy apple aphid, apply prior to leafrolling caused by the pest.</p> <p>For first generation leafminer control, make first application as soon as petal-fall is complete. Greatest control will result from the earliest possible application. For second and succeeding generations, best control is obtained from applications made early in the adult flight against egg and early instar larvae. A second application may be required 10 days later if severe pressure continues or if generations are overlapping. A single application may result in suppression only. This product will not control late stage larvae.</p> <p>For San Jose Scale, time applications to the crawler stage. Treat each generation.</p> <p>For late season (preharvest) control of leafhopper species, apply this product while most leafhoppers are in the nymphal stage.</p> <p>For optimal control of mealybug, insure good spray coverage of the trunk and scaffolding limbs or other resting sites.</p> <p>RESTRICTIONS:</p> <ul style="list-style-type: none"> • Do not apply more than 2.1 ounces per acre in a single application. • Do not make more than 5 applications in a year • Maximum yearly application amount is 8.6 oz., (0.4 lb. ai) per acre. • Allow 10 or more days between applications. • Allow at least 7 days between last application and harvest.

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Pecan ³	Yellow pecan aphid Black margined aphid Pecan leaf phylloxera Pecan spittlebug Pecan stem phylloxera	1.6 oz. (1 packet) per 300 gals. of water (2.1 oz. per acre ¹)	<p>Make foliar applications as pests begin to build before populations become extreme. Two applications at a 10 to 14 day interval may be required to achieve control. Scout and retreat if needed.</p> <p>Thorough uniform coverage of foliage is necessary for optimal control. Addition of an organosilicone-based spray adjuvant at a rate not to exceed the adjuvant manufacturer’s recommended use rate may improve coverage.</p> <p>Restrictions:</p> <ul style="list-style-type: none"> • Do not apply more than a total of 6.3 ounces of this product per acre per year. • Do not make more than 3 applications. • Allow 10 or more days between applications. • Allow at least 7 days between last application and harvest. • Do not apply through any type of irrigation system.
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¹ The amount of this product required per acre will depend on tree size and volume of foliage present. The rate per acre is based on a standard of 400 gallons of dilute spray solution per acre for large trees.

² Not for use in California for control on pears.

³ Use on pecans not permitted in California unless directed by specific 24(c) labeling.

FOR USE ALONG THE OUTSIDE PERIMETERS OF INDUSTRIAL AND COMMERCIAL BUILDINGS AND RESIDENTIAL AREAS

SITE	PEST	RATE	INSTRUCTIONS
Grapes	Leafhoppers (including glassy-winged sharpshooter) Mealybugs	1.6 oz. (1 packet) per 300 gal. of water (1.0 oz. per acre)	<p>Apply specified dosage as a foliar spray using 200 gallons of water per acre.</p> <p>Restrictions:</p> <ul style="list-style-type: none"> • Do not apply more than a total of 2.0 oz. of this product per acre per year. • Allow at least 14 days between applications. • Applications may be applied up to and including day of harvest.

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STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Do not store below freezing (32°F). Exposure to moisture or excessive handling of water soluble packets may cause breakage. Store water soluble packets in original container and out of reach of children, preferably in a locked storage area.

Handle and open container carefully. Do not cut water soluble packets when opening. If container is leaking or material spilled for any reason or cause, carefully sweep material into a pile. Refer to PRECAUTIONARY STATEMENTS on label for hazards associated with the handling of this material. Do not walk through spilled material. Dispose of pesticide as directed below. In spill or leak incidents, keep unauthorized people away. You may contact CHEMTREC (800-424-9300) for decontamination procedures or any other assistance that may be necessary.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available. Do not use carton in connection with food, feed or drinking water. The empty foil wrappers may be disposed of in the trash. After removing all PVA packets, the carton may be disposed of in the trash.

IMPORTANT READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of liability before using this product. If terms are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following CONDITIONS, DISCLAIMER OF WARRANTIES, and LIMITATIONS OF LIABILITY.

The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risk associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Control Solutions, Inc. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Control Solutions, Inc. makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of Control Solutions, Inc. is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Control Solutions, Inc. disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of

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this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at Control Solutions, Inc election, the replacement of product.

EPA Reg. No. 53883-201

EPA Est. No. 53883-TX-002

Net Contents _____

Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507

[Label text to be printed on Water Soluble Packets]

IMI 75
Insecticide in Water Soluble Packets
[ABN: IMI 75 WSP}
[ABN: IMI 75}
Generic Descriptor [Insecticide]
Generic Descriptor [Insecticide in Water Soluble Packets]

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine..... 75%

OTHER INGREDIENTS:.....25%

Total: 100%

Keep out of reach of children.

CAUTION

Please refer to product labeling for additional
Precautionary Statements and complete Directions for Use.